

From: Hoffman, Erika
Sent: Thursday, June 23, 2016 12:23 PM
To: Habel, Darren NWS
Cc: Sanga, Ravi
Subject: RE: NWS-2013-166 US. Coast Guard

Thanks for coordinating with EPA on the Coast Guard's request for modification to the permit NWS-2013-166. From our conference call on June 8 (2016) and your subsequent email (below), we understand that the Coast Guard is only proposing to move forward with Phase I above water work this project. The following CERCLA coordination, therefore, only pertains to repairs at Piers 37, 36A and 36B that will be made above the high water level which include replacement of fender chains, braces, and rails; sealing cracks and topping slabs; and repairing spalls, fungal decay, deck drains, and cable conduits.

1. Adherence any relevant sections of EPA's newly revised Pile removal and placement BMPs (attached), particularly those involved debris control (#20 - 23) and spill containment. Although all proposed activities will occur above MHW, it is important that the applicant implement the necessary BMPs to keep any construction debris from entering the water.

3. As was true for the original 2013 permit, the standard Superfund paragraph applies to this proposed modification.

Although EPA does not have concerns about this above-water Phase I work relative to disturbing sediments in the area of Pier 36, we remain very concerned about sediment contamination under this pier and along the wharf face. Based on the results of testing performed following the completion of the Coast Guard's 2013 pile maintenance project, EPA determined that surface sediments beneath the entire wharf area and adjacent berth were highly contaminated with various COCs (e.g., PAHs and TBT) and required cleanup. In June of 2015, EPA initiated a dialogue with David Stalters, Chief Environmental Management Branch US Coast Guard Civil Engineering Unit (CEU) Oakland and explained the need for the Coast Guard to conduct a Removal Assessment to help determine the extent of contamination which warranted expedited removal. A Removal Assessment is necessary because we currently do not have sufficient data from this area to make a determination of the lateral and vertical extent of remediation that is needed.

Since 2015, however, little progress has been made on determining what this assessment would involve and a time frame for its completion. EPA has directed the USCG to develop a QAPP for additional sampling and has offered to meet with them to help refine the scope of such an investigation based on likely scenarios for under-wharf remediation. The last communication we've received on this from the USCG was in June of this year. EPA is moving forward with this CERCLA coordination with the expectation that the Coast Guard will initiate a removal assessment in the Slip to address the highly contaminated sediments by the end of the calendar year 2016.

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From: Habel, Darren NWS [mailto:Darren.Habel@usace.army.mil]
Sent: Wednesday, June 08, 2016 1:51 PM
To: Hoffman, Erika <Hoffman.Erika@epa.gov>; Barboza, Gilda CIV <Ana.G.Barboza@uscg.mil>
Subject: NWS-2013-166 US. Coast Guard

Thank you all for the phone call. Based on the conversation, the Coast Guard would like to move forward at this time with the Phase I above water work and hold off on the Phase II work until a later date. I will verify the 2013 permit to include the phase I work.

Darren

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